

June 15, 2015

Mr. Charles David Abshire (6SF-AP)  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2773

RE: May 2015 Monthly Progress Report  
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210  
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

The Malone Cooperating Parties (MCP) submit the May 2015 Monthly Progress Report in compliance with the Consent Decree and Statement of Work for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX.

Should you have any questions, please contact me at 919-539-1928 or [bobp@projectnavigator.com](mailto:bobp@projectnavigator.com).

Sincerely,

*R Piniewski*

Robert Piniewski  
Project Coordinator

cc: Marilyn Long - TCEQ  
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE  
MAY 2015 MONTHLY PROGRESS REPORT  
SUBMITTED JUNE 15, 2015**

---

**1) SUMMARY OF WORK PERFORMED IN MAY 2015**

- a) MCP representatives submitted the Final Phase Two Work Plans and Storm Water Management Plan Addendum #2 on May 26, 2015.
- b) ENTACT personnel and equipment continued Phase Two RD/RA work. Site work conducted during April included:
  - i) Continued construction of earthen impoundment for contact storm water storage
  - ii) Solidification of sludge in the API separators, approximately 6,900 cubic yards to date
- c) MCP representatives continued work on:
  - i) Final design work for a water storage and treatment system
  - ii) Preparation of draft Phase One Completion Report
  - iii) Continued injection of stormwater and groundwater at injection wells
- d) MCP representatives submitted Section 2 Geology to EPA and UIC to support the 2015 Hazardous Waste Disposal Injection Restriction (HWDIR) renewal application, continued work on reissuance and planning for injection/falloff tests at the injection wells.
- e) MCP representatives scheduled the reinterment at Forest Park East for June 22, 2015.

**2) SUMMARY OF SAMPLING/TESTING RESULTS**

- a) Collected non-contact storm water samples for potential discharge to Swan Lake. Results will be compiled and reviewed and provided in future reports.

**3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS**

- a) A summary of the most recent Agency Communication is shown in Table 1.

**4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN**

- a) None.

**5) COMMUNITY RELATIONS ACTIVITIES**

- a) At the request of EPA, PNL and the MCP will coordinate with the EPA Remedial Project Manager and EPA's community relations personnel to plan and conduct an off-Site community meeting.

**6) CHANGE IN PERSONNEL OR OPERATIONS**

- a) None.

**7) SCHEDULE**

- a) The Phase Two schedule is contained in the draft Phase Two Work Plans.

## **8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS - JUNE and JULY 2015**

- a) Phase Two RA work:
  - i) Complete construction of earthen impoundment
  - ii) Complete installation of dewatering system around Sludge Pit
  - iii) Begin dewatering operations
  - iv) Continue with solidification of sludge
  - v) Begin excavation of soil
  - vi) Begin construction of RCRA Cell
- b) Deliverables
  - i) Submit draft Phase One Completion Report to EPA
  - ii) Submit no migration exemption renewal
- c) Injection Wells
  - i) Complete and submit the petition for renewal of the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells
  - ii) Perform injection / falloff testing on WDW-73
  - iii) Continued injection of stormwater and groundwater at injection wells
- d) Continue Cemetery Relocation efforts for reinterment
- e) Continue Independent Quality Assurance Team work

**Table 1**  
**Recent Agency Communication Summary**  
**Malone Service Company Superfund Site – Texas City, TX**

<b>Date</b>	<b>MCP Communication Summary</b>	<b>Response From EPA Date</b>	<b>EPA Communication Summary</b>	<b>Notes</b>
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One RA Work Plan due to the Government shutdown.	12/12/13	EPA approved the request.	
12/20/13	Submitted draft Phase One RA Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	EPA comments received on 1/31/14.	
1/31/14	MCP received EPA & TCEQ comments on Phase One RA Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	
2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	

**Table 1**  
**Recent Agency Communication Summary**  
**Malone Service Company Superfund Site – Texas City, TX**

<b>Date</b>	<b>MCP Communication Summary</b>	<b>Response From EPA Date</b>	<b>EPA Communication Summary</b>	<b>Notes</b>
2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		
3/3/14	The MCP submitted its responses to Agency comments on the draft Phase One RA Work Plan.	3/4/14	EPA approved the response to comments via email.	
3/4/14	The MCP received information from EPA to facilitate the approval/reissuance of the No Migration Exemption for the injection well.	n.a.		
3/6/14	The MCP submitted a copy of the order of the Galveston County District Court granting our motion for summary judgment on the petition for removal of remains and removal of the cemetery dedication regarding the cemetery area at the Malone Site.	n.a.		
3/10/14	The MCP submitted the Final Phase One RA Work Plan and Storm Water Management Plan V1.	3/25/14	EPA approved the Phase One RA Work Plan.	
3/25/14	The MCP notified EPA and TCEQ that ENTACT will mobilize to the Site on April 7, 2014 to begin Phase One RA work and that MCP representatives will also be mobilizing on April 7, 2014 to begin cemetery relocation work.	n.a.		
4/7/14	The MCP submitted a request to shift the installation of the dewatering system and slurry wall from Phase Two to Phase One RA work. The early install of these remedy elements will allow the MCP to begin dewatering sooner and improve solidification efforts.	4/10/14	EPA approved the request.	
5/9/14	The MCP submitted the injection well rehabilitation procedures for the injection wells at the Site.	5/29/14	EPA approved the procedures.	

**Table 1**  
**Recent Agency Communication Summary**  
**Malone Service Company Superfund Site – Texas City, TX**

<b>Date</b>	<b>MCP Communication Summary</b>	<b>Response From EPA Date</b>	<b>EPA Communication Summary</b>	<b>Notes</b>
6/12/14	The MCP submitted revised injection well rehabilitation procedures for injection well WDW-138.	6/13/14	EPA approved the revised procedures.	
8/15/14	The MCP requested a 60 day extension for submittal of the draft Phase Two RD/RA Work Plans	8/18/14	EPA approved the extension.	
9/4/14	The MCP submitted WDW-138 MIT and workover reports.	11/21/14	Approved pending falloff testing.	
9/29/14	The MCP submitted WDW-73 MIT and workover reports.	11/21/14	Approved pending falloff testing.	
10/16/14	The MCP submitted a request to EPA to modify the performance specification for treated material (solidified sludge) at the Site from a minimum Unconfined Compressive Strength (UCS) of 25 psi with no free liquids to a minimum UCS of 15 psi with no free liquids.	12/23/14	EPA approved the modified performance specification	
10/20/14	The MCP submitted the draft Phase Two Remedial Design and Remedial Action Work Plan and an updated Construction Quality Assurance Plan.	1/23/15	EPA and TCEQ provided comments	
11/3/14	Submitted request to shift cleaning and demolition of tanks containing sludge from Phase One to Phase Two work to EPA.	11/13/14	EPA approved the request.	
11/6/14	Submitted documentation of insurance coverage as required by the CD/SOW.	n.a.		
1/23/15	Received EPA and TCEQ Comments on draft Phase Two Remedial Design and Remedial Action Work Plan.	n.a.		
1/29/15	Received EPA approval of ENTACT's Quality Management Plan	n.a.		
2/20/15	The MCP notified EPA that it has completed the third required payment of \$16 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		

**Table 1**  
**Recent Agency Communication Summary**  
**Malone Service Company Superfund Site – Texas City, TX**

<b>Date</b>	<b>MCP Communication Summary</b>	<b>Response From EPA Date</b>	<b>EPA Communication Summary</b>	<b>Notes</b>
2/25/15	Submitted email request for mobilization date of March 23, 2014 and slight modification to stormwater discharge outfall.	2/25/15	EPA approved the request and modification.	
3/11/15	Submitted MCP's Response to EPA and TCEQ Comments received on 1/23/15.	3/30/15	Received EPA and TCEQ's Comments on MCP's 3/11/15 Response to Comments.	
4/24/15	Submitted MCP's Response to EPA and TCEQ Comments received on 3/30/15	4/27/15	EPA approved the response to comments	
5/19/15	Submitted Section 2.0, Geology, to EPA and UIC for 2015 Hazardous Waste Disposal Injection Restriction (HWDIR) renewal application	pending		
5/26/15	Submitted Final Phase Two RD/RA Work Plans, Stormwater Management Plan Addendum #2 and updated Construction Quality Assurance Plan (for Phase Two work)	pending		
6/8/15	Submitted Phase One Completion Report	pending		
6/15/15	Submitted Sections 1, 3 and 4 to EPA and UIC for 2015 Hazardous Waste Disposal Injection Restriction (HWDIR) renewal application	pending		